

**UNITED STATES DISTRICT COURT
DISTRICT OF UTAH
CENTRAL DIVISION**

UNITED STATES OF AMERICA,

Plaintiff and Counter-Defendant,

v.

FEATURE FILMS FOR FAMILIES, INC.,

CORPORATIONS FOR CHARACTER, L.C.,

FAMILY FILMS OF UTAH, INC., and

FORREST SANDUSKY BAKER III, individually
and as owner and principal officer of
FEATURE FILMS FOR FAMILIES,
INC., CORPORATIONS FOR
CHARACTER, L.C., and FAMILY
FILMS OF UTAH, INC.,

Defendants and Counter-Plaintiffs.

Case 2:11-cv-00419-RJS-DBP

**MOTION FOR LEAVE TO
CONSOLIDATE RESPONSES TO
DEFENDANTS' MOTIONS FOR
PARTIAL SUMMARY
JUDGMENT**

On November 15, 2012, Magistrate Judge Furse ordered that the United States file memoranda in opposition to three motions for partial summary judgment on or before December 14, 2012. Dkt. No. 69. To promote judicial efficiency, the United States respectfully requests leave of Court to file a consolidated response to Defendants' three motions. Responding to each motion separately would have resulted in three briefs, each of which would repeat certain sections and cross-reference one another. Clarity is best served by the filing of one consolidated response.

Accordingly, the United States requests leave of Court to file its opposition to Defendants three separate motions for summary judgment as one omnibus brief.

Dated: December 14, 2012

Respectfully Submitted,

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CERTIFICATE OF SERVICE

I, Daniel M. Baeza, certify that on December 14, 2012 I served a true copy of the United States' Motion for Leave to Consolidate Responses to Defendants' motions for Partial Summary Judgment on all counsel of record via ECF.

s/ Daniel M. Baeza
DANIEL M. BAEZA